



Delta Stewardship Council

A CALIFORNIA STATE AGENCY

February 16, 2022

Michael B. Johnson, State Asset Management Engineer
California Department of Transportation
1129 N Street
Sacramento, CA 95814

Sent via email: CT-TAM@dot.ca.gov

RE: DRAFT 2022 California Transportation Asset Management Plan (TAMP)

Dear Michael Johnson:

Thank you for the opportunity to review and comment on the draft 2022 California Transportation Asset Management Plan (TAMP). The Delta Stewardship Council (Council) understands the objectives of the draft TAMP to outline the physical condition of key transportation assets in California and strategically maximize limited resources, incorporate risk, and manage the life cycle of these assets to minimize long-term ownership costs. Council staff submitted input on the draft TAMP on February 11, 2022 via the survey link provided by Caltrans on the TAMP website. This letter constitutes the Council's review of the draft TAMP and provides additional context to comments submitted on the survey.

The 2009 Delta Reform Act charged the Council with furthering the State's coequal goals for the Sacramento-San Joaquin Delta (the Delta) of providing a more reliable water supply for California and protecting, restoring, and enhancing the Delta ecosystem, to be achieved in a manner that protects and enhances the unique cultural, recreational, natural resource, and agricultural values of the Delta as an evolving place. (Wat. Code § 85054). A major part of this includes long-term planning for climate change, including consideration for the future of major infrastructure, including transportation facilities. Additionally, Water Code Sections 85307(c) and 85320(c) outline the Council's role in consulting with Caltrans to address climate change and sea level rise across the Delta, and the need to plan for up to 55 inches of sea level rise and possible changes in precipitation and runoff, respectively. Lastly, Public Resources Code Section 71156 requires all state agencies to take into account

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the current and future impacts of climate change when planning, designing, building, operating, and investing in state infrastructure.

The draft TAMP provides a framework for understanding performance gaps, prioritizing actions to address the gaps, and establishing business processes that streamline asset management activities. It develops a shared vision for maintaining the state's transportation system, identifies performance measures for safety, reliability, and overall condition, and outlines an approach to life cycle planning in a changing climate. The draft TAMP discusses strategies for managing risks and building resilience, with recognition of the challenges associated with climate change and sea level rise specifically. It also calls for additional climate change initiatives, leadership, adaptation measures, and community engagement. These measures – as well as Caltrans' 2019 vulnerability assessments and participation in other regional climate adaptation frameworks – are helpful in assessing vulnerabilities to climate change.

Comments on the draft TAMP

We appreciate that the draft TAMP highlights the risks that sea level rise and flooding pose to transportation infrastructure in California. However, the current draft describes this as a concern for coastal areas (section 5.1, p. 111). While coastal areas may be the most directly affected by increased erosion, the Delta and inland connected waterways are also subject to sea level rise and changes in flood exposure. We request that this be acknowledged in the final TAMP. Two Council projects may be of interest in quantifying parts of this exposure and potential solutions: Delta Adapts and the Delta Levees Investment Strategy.

The Council is currently carrying out the first-ever comprehensive climate change vulnerability assessment (VA) and adaptation strategy (AS) for the Delta. Known as [Delta Adapts](#), this work aims to inform Delta Plan implementation, help the State prioritize future actions and investments, provide a toolkit of information for local governments, and serve as a framework for the Council and others to build upon in future work. Delta Adapts relies heavily on collaboration with agency partners and stakeholder engagement in a variety of forums ranging from technical advisory committee (TAC) meetings to community-based organization-led workshops. The first phase of this initiative, a vulnerability assessment, was completed in 2021 and includes a detailed assessment of potential impacts to infrastructure in the Delta, including transportation networks in or that pass through the Delta.

Although the draft TAMP includes a focus on sea level rise, it does not address the projected impacts of sea level and changes in riverine inflows within the Delta. We encourage Caltrans to include discussion of transportation assets in the Delta in the final

TAMP, as well as the expected impacts from climate change on those assets, as the Delta is expected to experience up to 1.9 feet of sea level rise by 2050¹. The Delta is a major component of and is connected to the larger San Francisco Bay Estuary, and as discussed above, is also subject to sea level rise. Numerous local and regional roads cross the Delta, including State Route (SR) 12, SR 4, and SR 160, and the area is partially bounded by I-680, I-80, and I-5. The vulnerability of these transportation assets to flooding from sea level rise and changes in inflows in the Delta should be acknowledged in the final TAMP. For more information on sea level rise and flood vulnerability in the Delta, please refer to the [Delta Adapts Flood Hazard Assessment Technical Memo](#) which outlines the effects of sea level rise and changing Delta inflows on local water levels within the Delta. Data for flood risk exposure developed as part of Delta Adapts was shared with Caltrans staff, as requested, on February 2, 2022.

The final TAMP should also consider the [Delta Levees Investment Strategy](#) (DLIS), a multi-agency effort led by the Council to update priorities for state investments in the Delta levee system to reduce the likelihood and consequences of levee failures, and to protect people, property and state interests. DLIS was first developed in 2014, and was recently updated to include new information regarding the heights of levees and Delta island floors into the risk assessment and prioritization calculations. This is relevant to transportation assets as many Delta levees have roads running along their crest (including portions of SR 160) or protect additional transportation assets within the region.

Lastly, we appreciate the section of the draft that discusses equity in transportation and efforts to develop an equity index and include equity in future asset management. We also encourage Caltrans to consider environmental justice throughout every aspect of the TAMP. The Council anticipates developing an environmental justice issue paper in the coming year that could both help inform implementation of Delta Adapts as well as Caltrans investments in transportation infrastructure in the region. We encourage you to engage with Council staff on this effort.

The draft TAMP provides valuable information and approaches that can help guide the future of transportation in the Delta. We invite Caltrans and partners to engage with the Council as you continue to work on specific actions identified in the draft TAMP. Please contact Morgan Chow at (916) 445-5511 or morgan.chow@deltacouncil.ca.gov with any questions.

¹ California Ocean Protection Council (OPC). 2018. State of California Sea-Level Rise Guidance. 2018 Update. http://www.opc.ca.gov/webmaster/ftp/pdf/agenda_items/20180314/Item3_Exhibit-A_OPC_SLR_Guidance-rd3.pdf

Michael B. Johnson
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Sincerely,

A handwritten signature in black ink, appearing to read "Jeff Henderson", with a long horizontal flourish extending to the right.

Jeff Henderson, AICP
Deputy Executive Officer
Delta Stewardship Council

CC: Michael Johnson, State Asset Management Engineer
(michael.b.johnson@dot.ca.gov)

Marlon Regisford, Deputy District Director, Planning, Local Assistance, and
Environmental, Caltrans District 10 (marlon.regisford@dot.ca.gov)

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